

EXHIBIT 2

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*Attorney for Plaintiff Cindy Adam
and the putative Class*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CINDY ADAM,

Plaintiff,

vs.

FRANK V. BARONE; KIRILL

CHUMENKO; GREEN POGO LLC

(DELAWARE); GREEN POGO LLC

(NEW JERSEY); NATURAL BEAUTY

LINE LLC; VEGAN BEAUTY LLC;

IMPROVED NUTRACEUTICALS LLC;

FORTERA NUTRA SOLUTIONS LLC;

ADVANCED BEAUTY LLC; SFLG

INC.; KURT ELLIS; and JOHN DOES 1-

10,

Defendant(s)

Case No.:

**DECLARATION OF KEVIN M. KNEUPPER
RE: VENUE PURSUANT TO CAL. CIV.
CODE § 1780(d)**

I, Kevin M. Kneupper, do hereby declare as follows:

DECLARATION OF KEVIN M. KNEUPPER RE: VENUE TO CAL. CIV. CODE § 1780(d)

1 1. I am a partner at Kneupper & Covey PC, counsel of record for Plaintiff Cindy
2 Adam. I am licensed to practice law in the States of California and Texas. I make this
3 declaration to the best of my knowledge, information, and belief of the facts stated herein.

4 2. Venue is proper in this Court because Defendants are doing business in the
5 County of San Mateo, CA by selling and delivering their products there and the transactions
6 at issue (the sale to Plaintiff Cindy Adam) also occurred in the County of San Mateo, CA.

7
8 I declare and state under penalty of perjury pursuant to the laws of the State of California
9 that the foregoing is true and correct, and that this Declaration was executed this 1st day of
10 February, 2020 in Glendale, California.

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15 Kevin M. Kneupper, Esq.
16 Declarant
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